

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

VERONICA Y. McCALL-SCOVENS

*

Plaintiff,

*

v.

* Civil Action No.: 15-CV-03433-ELH

MAY HSEIH BLANCHARD, M.D., *et al*

*

Defendants.

*

**PLAINTIFF'S CERTIFICATE OF GOOD FAITH TO RESOLVE A
DISCOVERY DISPUTE PURSUANT TO FEDERAL RULE 26(c)**

The Plaintiff, Veronica McCall-Skovens, by and through her attorney, Louis G. Close, III, and pursuant to Federal Rules of Evidence 26(c), hereby files this Certificate of Good Faith and states as follows:

1. On Friday, April 15, 2016 in an effort to avoid this discovery dispute, counsel for the Plaintiff called and left a voicemail message with counsel for the Defendants May Hseih Blanchard, M.D. and Vadim Morozov, M.D., requesting that the Defendants withdraw their March 23, 2016 Subpoena *Duces Tecum* improperly seeking the Plaintiff Veronica McCall-Skovens's mental health records.

2. Counsel for the Defendants have not responded to Plaintiff's counsel's request that the Defendants agree to withdraw their Subpoena *Duces Tecum*.

Respectfully submitted,

/s/ Louis G. Close, III

Louis G. Close, III
403 Central Avenue
Towson, Maryland 21204
Federal Bar No. 23209
Phone: (410) 296-3606
Fax: (410) 296-0080
E-mail: lgclose@lgclaw.net
Attorney for Plaintiff